## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:		§	Chapter 11
AGILON ENERGY HOLDINGS	П	§ 8	CASE NO. 21-32156 (MI)
LLC, et al. <sup>1</sup>		§	(1.11)
		§	
Debtors		§	

## NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES, AND DEMAND FOR SERVICE OF ALL PLEADINGS AND FILINGS AND SUBSTITUTION OF COUNSEL

PLEASE TAKE NOTICE that the undersigned hereby enters an appearance on behalf of ProEnergy Services, LLC ("ProEnergy"), creditor and party in interest in the above styled and numbered Chapter 11 bankruptcy cases, as attorneys for such party, and hereby requests notice of all hearings and conferences in such case and makes demand for service of copies all pleadings, filings, notices, and other actions and papers pursuant to Fed. R. Bankr. P. 2002 and 9010(b), and Bankruptcy Local Rule 2002. All such notices should be addressed as follows:

William B. Westcott
T. Josh Judd
Brittany C. Cooperrider
Andrews Myers, P.C.
1885 Saint James Place, 15<sup>th</sup> Floor
Houston, Texas 77056
713-850-4227 – Telephone
832-786-4877– Facsimile
bwestcott@andrewsmyers.com
jjudd@andrewsmyers.com
bcooperrider@andrewsmyers.com

\_

<sup>&</sup>lt;sup>1</sup> The debtors and debtors in possession of these chapter 11 cases (the "Bankruptcy Case(s)"), along with the last four digits of their respective Employer Identification Numbers, are as follows: Agilon Energy Holdings II LLC (3389) ("Agilon"); Victoria Port Power LLC (4894) ("VPP"); and Victoria City Power LLC (4169) ("VCP" and together with Agilon and CPP, the "Debtors"). The Debtors' mailing address is 5850 San Felipe, Suite 601, Houston, Texas 77057.

PLEASE NOTE FURTHER that the foregoing request and demand includes not only the notices, pleadings, filings, and papers referred to in the above-referenced Bankruptcy Rules, but also includes, without limitation, the Debtors' schedules and statements and all supplements thereto, and any and all plans, letters, correspondence, applications, motions, complaints, objections, claims, demands, hearing notices, or requests, whether formal or informal, whether oral or in writing, which may be filed, submitted, transmitted, or conveyed to the Bankruptcy Clerk, Bankruptcy Court, or Bankruptcy Judge (as such terms are used and defined in Bankruptcy Rule 9001) in connection with this bankruptcy case and any proceedings related thereto or arising therefrom.

This Notice of Appearance and Request for Notice and Papers shall not be deemed or construed to be a waiver or consent by ProEnergy including, without limitation, to (i) have final orders in non-core matters entered only after de novo review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which ProEnergy may be entitled in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 28, 2021

Respectfully submitted,

ANDREWS MYERS P.C.

/s / T. Josh Judd

William B. Westcott SBN: 24028219 T. Josh Judd SBN: 24036866

Brittany C. Cooperrider

SBN: 24087355

1885 Saint James Place, 15th Floor

Houston, TX 77056 Tel: 713-850-4200 Fax: 713-850-4211

jjudd@andrewsmyers.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2021, a true and correct copy of the foregoing Notice of Appearance and Request for Service of Notices was served via the Court's Electronic Notification System on all parties entitled to such notice.

By: <u>/s/ T. Josh Judd</u>

T. JOSH JUDD